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William J. Cadogan, Thomas J. Hopkins,  
James M. McCormick, Donnie M. Moore, and  
Nominal Defendant Synchronoss Technologies, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE SYNCHRONOSS  
TECHNOLOGIES, INC.  
DERIVATIVE LITIGATION

Civil Action No. 17-cv-07173  
(FLW)(LHG)

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**NOTICE OF DEFENDANTS'  
MOTION TO DISMISS THE AMENDED DERIVATIVE COMPLAINT**

*Oral Argument Requested*

**PLEASE TAKE NOTICE** that upon the Memorandum of Law submitted by Defendants Stephen G. Waldis, William J. Cadogan, Thomas J. Hopkins, James M. McCormick, and Donnie M. Moore, and Nominal Defendant Synchronoss Technologies, Inc., Defendants hereby move this Court for an order dismissing, with prejudice, the Amended Derivative Complaint, dated July 13, 2020, pursuant to Federal Rules of Civil Procedure 23.1 and 12(b)(6).

Dated: September 11, 2020      Respectfully submitted,

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Harvey Bartle IV

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Nominal Defendant Synchronoss Technologies,  
Inc.*

**CERTIFICATE OF SERVICE**

I, Harvey Bartle IV, hereby certify that on September 11, 2020, I served the Motion to Dismiss the Amended Derivative Complaint by filing the same via ECF to distribute to all counsel of record.

Dated: September 11, 2020

/s/ Harvey Bartle IV  
Harvey Bartle IV